

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)

RAMBUS INC.,

Plaintiff-Counterclaim Defendant,
v.

INFINEON TECHNOLOGIES AG *et al.*,

Defendants-Counterclaim Plaintiffs.

Civil Action No. 3:00CV524

AMENDED PRIOR ART NOTICE PURSUANT TO 35 U.S.C. § 282

Defendants Infineon Technologies AG, Infineon Technologies North America Corp. and Infineon Technologies Holding North America Inc. (collectively, "Infineon"), by their attorneys and pursuant to 35 U.S.C. § 282, submit this amended prior art notice.

PATENTS

<u>Inventor</u>	<u>Patent Number</u>	<u>Date</u>
Nishiguchi	U.S. 4,445,204	April 24, 1984
Saccardi	U.S. 4,858,113	August 15, 1989
Kawai	U.S. 4,953,128	August 28, 1990
White	U.S. 5,140,688	August 18, 1992
Wiggers	U.S. 4,998,262	March 5, 1991
Grover	U.S. 5,361,277	November 1, 1994
Patel	U.S. 3,950,735	April 13, 1976
Wiener	U.S. 3,771,145	November 6, 1973
Redwine	U.S. 4,330,852	May 18, 1982

<u>Inventor</u>	<u>Patent Number</u>	<u>Date</u>
Bomba	U.S. 4,763,249	August 9, 1988
Glier	U.S. 4,755,937	July 5, 1988
Jackson	U.S. 4,315,308	February 9, 1982
Matsumoto	U.S. 4,875,192	October 17, 1989
James	U.S. 4,703,418	October 27, 1987
Horiguchi	U.S. 4,726,021	February 16, 1988
Kimoto	U.S. 4,870,562	September 26, 1989
Kawamasa	Japanese Patent Application 54-160587 / Sho 56-82961	July 7, 1981
Hasegawa	Japanese Patent Application 58-186919 / Sho 60-80193	May 8, 1985
Kumagai	Japanese Patent Application 62-185253 / Sho 64-29951	January 31, 1989
Taguri	Japanese Patent Application 55-89232 / Sho 57-14922	January 26, 1982
Yamaguchi	Japanese Patent Application 62-71428 / Sho 63-239676	October 5, 1988
Miyazaki	Japanese Patent Application Sho 60-55459	March 30, 1985
Hashimoto et al.	Japanese Patent Application S 61-72350	April 14, 1986
Petrich	U.S. 4,338,569	July 4, 1989
Chappell et. al.	U.S. 4,845,677	July 6, 1982

PUBLICATIONS

<u>Author(s)</u>	<u>Description</u>	<u>Date</u>
Johnson et al.	A Variable Delay Line PLL for CPU-Coprocessor Synchronization, IEEE JSSC, Vol. 23, No. 5	October 1988
Pelgrom et al.	A 32 KBIT Variable Length Shift Register for Digital Audio Application, ESSCIRC, pp. 38-40	June 1986
Grover et al.	Precision Time-Transfer in Transport Networks Using Digital Crossconnect Systems, GLOBECOM (publication)	1988
Grover et al.	Precision Time-Transfer in Transport Networks Using Digital Crossconnect Systems, GLOBECOM (presentation)	1988
Pinkham et al.	A High Speed Dual Port Memory with Simultaneous Serial and Random Mode Access for Video Applications	December 1984
IBM	Fast Packet Bus for Microprocessor Systems with Caches, IBM TBD pp. 279-282	January 1989
Watanabe	Session XIX: High Density SRAMs, IEEE ISSCC, pp. 266-267	1987
Gustavson et al.	The Scalable Coherent Interface Project (Superbus), Draft	August 22, 1988
James	P1596: SCI, A Scalable Coherent Interface	November 28, 1988
James	Scalable I/O Architecture for Buses	November 28, 1988
Gustavson	Scalable Coherent Interface	November 28, 1988
Alnes	SCI: A Proposal For SCI Operation	November 10, 1988
Alnes	SCI: A Proposal For SCI Operation	January 6, 1989
Bakka et al.	SCI: Logical Level Proposals	January 6, 1989
Kristiansen	Scalable Coherent Interface	February 1989

<u>Author(s)</u>	<u>Description</u>	<u>Date</u>
Kristiansen	Scalable Coherent Interface	September 1989
Boysel et. al	Random-Access MOS Memory Packs More Bits To The Chip	February 16, 1970
Boysel et. al	Four-Phase LSI Logic Offers New Approach to Computer Designer	April 1970

OTHER PRIOR ART

<u>Description</u>	<u>Date</u>
Wiggers' Notes	March 1987 - January 1988
Siemens' SDA 9087 and SDA 9088 integrated circuits, described in "ICs For Entertainment Electronics - Picture-in- Picture System" (8/89)	1988-1989

KNOWLEDGEABLE PERSONS / PRIOR INVENTORS

Persons identified as inventors or authors in the above prior art

David Gustavson
1946 Fallen Leaf Lane
Los Altos, CA 94024

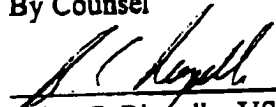
John Moussouris
MicroUnity Systems Engineering, Inc.
376 Martin Avenue
Santa Clara, CA 95050

David Sealer
Infineon Technologies North America Corp.
1730 North First Street
San Jose, CA 95112

Dated: March 9, 2001

INFINEON TECHNOLOGIES AG *et al.*

By Counsel



Brian C. Rippelle, VSB #36454
Robert M. Tyler, VSB #37861
McGUIRE WOODS LLP
One James Center
901 East Cary Street
Richmond, Virginia 23219-4030
(804) 775-1000

C. Torrence Armstrong, VSB #13739
Warren E. Zirkle, VSB #15321
McGUIRE WOODS LLP
1750 Tysons Boulevard, Suite 1800
McLean, Virginia 22102-3892
(703) 712-5000

OF COUNSEL:

KIRKLAND & ELLIS
Citigroup Center
153 East 53rd Street
New York, New York 10022
(212) 446-4800

ATTORNEYS FOR DEFENDANTS AND
COUNTERCLAIM PLAINTIFFS
INFINEON TECHNOLOGIES AG *et al.*

CERTIFICATE OF SERVICE

I certify that on this 9th day of March 2001, a copy of the foregoing **AMENDED PRIOR ART NOTICE PURSUANT TO 35 U.S.C. § 282** was sent to Counsel for Rambus Inc. as listed below:

BY HAND:

Michael W. Smith, Esq., VSB #01125
R. Braxton Hill, IV, Esq., VSB #41539
CHRISTIAN & BARTON, L.L.P.
909 East Main Street, Suite 1200
Richmond, Virginia 23219
(804) 697-4112

VIA FEDERAL EXPRESS:

David E. Monahan, Esq.
Alexander H. Rogers, Esq.
Sean C. Cunningham, Esq.
Edward H. Sikorski, Esq.
GRAY CARY WARE & FREIDENRICH LLP
401 B Street, Suite 1700
San Diego, California 92101-4297
(619) 236-1048

